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February 1, 2024

**BY ECF**

Hon. Frederic Block  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

**Re: Acosta, et al., v. City of New York, 22-cv-0576**

Dear Judge Block:

This firm along with co-counsel represents the Plaintiffs. We write to respectfully request a 60-day extension of time to file our fee application from the current deadline of February 9, 2024, up to and including April 9, 2024. This is the second such request and the Defendants consent. The reason for this request is because Defendants have not yet responded to Plaintiffs' November 28, 2023 fee demand, which also included counsel's timesheets. Michael Pesin-Virovets, counsel for the Defendants, has stated he hopes to have authority by February 8<sup>th</sup>. At that time, the parties may need to engage in further negotiations, requiring this further extension.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

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Jessica Massimi  
*Pronouns: She/Her*  
**COHEN&GREEN P.L.L.C.**  
*Attorneys for Plaintiff*  
1639 Centre St., Suite 216  
Ridgewood, New York 11385

cc:

All relevant parties by ECF.